

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

JOSE M. DE JESUS MIRANDA

Debtor

CASE NO. 10-01096-ESL

CHAPTER 13

**STIPULATION TO LIFT STAY**

**TO THE HONORABLE COURT:**

Comes now, Debtor and secured creditor Toyota Motor Credit Corporation ("Toyota Credit"), through their undersigned attorneys, and very respectfully state and pray:

1. Toyota Credit is a secured creditor of Debtor by virtue of being holder in due course of a duly registered conditional sales contract, that encumbers Debtor's 2004 Jaguar X-Type motor vehicle (the "Collateral").
2. On April 15, 2010, Debtor voluntarily surrendered Toyota Credit's collateral.
3. For such reason, the appearing parties agree to file this Stipulation in which Debtor lifts the automatic stay order and surrenders Toyota Credit's Collateral, and any proprietary interest in connection therewith.
4. Regarding Toyota Credit's security, the appearing parties agree to the following:
  - a. Debtor agrees to lift the automatic stay order and surrender Toyota Credit's Collateral and any proprietary interest in connection therewith as part of his plan of reorganization under Chapter 13 bankruptcy.
  - b. Debtor allows Toyota Credit to sell and/or dispose of Toyota Credit's collateral as it deems necessary.

c. This Stipulation shall be considered part of the Debtor's plan of reorganization and shall be notified to the Trustee and to all parties in interest, who are hereby advised that they have twenty-one (21) days to file their oppositions to the terms of this Stipulation. If no opposition is filed within twenty-one (21) days of the notice of this Stipulation, the Bankruptcy Court may enter an order approving the same.

Such is the Stipulation to Lift Stay agreed by the undersigned parties, whose approval by the Honorable Bankruptcy Court is respectfully requested.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 13th day of July, 2010.

**FERNANDEZ, COLLINS, CUYAR & PLA**  
Attorneys for Toyota Motor Credit Corporation

/s/ Maximiliano A. Plá Méndez  
MAXIMILIANO A. PLA MENDEZ  
USDCPR 224307  
P.O. BOX 023905  
SAN JUAN, P.R. 00902-3905  
TEL. 787-977-3772 FAX 787-977-3773  
[map@fccplawpr.com](mailto:map@fccplawpr.com)

**HERMAN F. VALENTIN FIGUEROA**  
Attorney for Debtor

/s/ Herman Valentín Figueroa  
HERMAN F. VALENTIN FIGUEROA  
USDCPR  
P.O. BOX 1888  
BAYAMON, P.R. 00960-1888  
TEL. 787-200-5426  
[ecf-cm@hvalentinassoc.com](mailto:ecf-cm@hvalentinassoc.com)

## **NOTICE**

Notice to all parties is hereby given that if no opposition to the terms of this Stipulation is filed within twenty-one (21) days of the notice of this Stipulation, the Bankruptcy Court may enter an order approving the same.

In San Juan, Puerto Rico, on this 13th day of July, 2010.

## **CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on this same date the foregoing was electronically filed, utilizing the CM/ECF System, which will notify the same to the Chapter 13; and to all interested parties included in the attached master address list.

In San Juan, Puerto Rico, on this 13th day of July, 2010.

**FERNANDEZ, COLLINS, CUYAR & PLA**

/s/ Maximiliano A. Plá Méndez  
MAXIMILIANO A. PLA MENDEZ  
USDCPR 224307  
P.O. BOX 9023905  
SAN JUAN, P.R. 00902-3905  
TEL. 787-977-3772 FAX 787-977-3773  
[map@fccplawpr.com](mailto:map@fccplawpr.com)

Label Matrix for local noticing  
0104-3  
Case 10-01096-ESL13  
District of Puerto Rico  
Old San Juan  
Tue Jul 13 13:24:25 AST 2010

PRA Receivables Management, LLC  
PO Box 41067  
Norfolk, VA 23541-1067

ASUME  
P.O. BOX 70376  
SAN JUAN, PR 00936-8376

CHASE  
CARDMEMBER SERVICE  
PO BOX 94014  
PALATINE, IL 60094-4014

FIA Card Services NA aka Bank of America  
by PRA Receivables Management, LLC  
PO Box 12907  
Norfolk VA 23541-0907

JOSE J NAZARIO DE LA ROSA  
URB SANTA RITA 867 CALLE DOMINGO CABRERA  
SAN JUAN PUERTO RICO 00925 2412

MARIA A. HERNANDEZ IGLESIAS  
URB. UNIVERSITY GARDENS  
CALLE CLEMSON #310 B  
SAN JUAN, PR 00927-4022

NCO FINANCIAL SYSTEMS, INC.  
P.O. BOX 12100, DEPT 64  
TRENTON, NJ 08650-2100

(p)TOYOTA MOTOR CREDIT CORPORATION  
PO BOX 8026  
CEDAR RAPIDS IA 52408-8026

eCAST Settlement Corporation assignee of Cha  
Bank USA NA successor by merger to  
Washington Mutual  
POB 29262  
New York NY 10087-9262

DEPARTAMENTO DE HACIENDA  
PO BOX 9024140  
OFICINA 424-B  
SAN JUAN, PR 00902-4140

US TRUSTEE  
EDIFICIO OCHOA  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901-1938

BANK OF AMERICA  
PO BOX 15019  
WILMINGTON, DE 19886-5019

Capital One Bank (USA), N.A.  
by American Infosource Lp As Agent  
PO Box 71083  
Charlotte, NC 28272-1083

HFC  
P.O. BOX 17574  
BALTIMORE, MD 21297-1574

JOSE J. NAZARIO DE LA ROSA  
URB. SANTA RITA  
867 CALLE DOMINGO CABRERA  
SAN JUAN PR 00927-2412

MERRICK BANK  
P.O. BOX 9201  
OLD BETHPAGE, NY 11804-9001

Portfolio Recovery Associates, LLC  
PO Box 41067  
Norfolk VA 23541-1067

Toyota Credit de Puerto Rico Corporation  
P.O. Box 366251  
San Juan, Puerto Rico 00936-6251

FEDERAL LITIGATION DEPT. OF JUSTICE  
PO BOX 9020192  
SAN JUAN, PR 00902-0192

PR DEPARTMENT OF LABOR  
PRUDENCIO RIVERA MARTINEZ BLDG  
505 MUNOZ RIVERA AVENUE  
12 FLOOR  
SAN JUAN, PR 00918

US Bankruptcy Court District of P.R.  
U.S. Post Office and Courthouse Building  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

CAPITAL ONE  
P.O. BOX 30285  
SALT LAKE CITY, UT 84130-0285

Department of Treasury  
Bankruptcy Section (424-B)  
PO Box 9024140  
San Juan, PR 00902-4140

JC PENNEY  
P.O. BOX 960090  
ORLANDO, FL 32896-0090

MARIA A. HERNANDEZ IGLESIAS  
UNIVERSITY GARDENS  
310-B CALLE CLEMSON  
SAN JUAN, PR 00927-4022

Merrick Bank  
c/o Resurgent Capital Services  
PO Box 10368  
Greenville, SC 29603-0368

Recovery Management Systems Corporation  
For GE Money Bank  
dba JCPENNEY CREDIT SERVICES  
25 SE 2nd Ave Ste 1120  
Miami FL 33131-1605

WELLS FARGO HOME MORTGAGE  
P.O. BOX 660455  
DALLAS, TX 75266-0455

HERMAN FRANCISCO VALENTIN FIGUEROA  
P.O. BOX 1888  
BAYAMON, PR 00960-1888

JOSE MIGUEL DE JESUS MIRANDA  
PMB 181 LA CUMBRE  
273 SIERRA MORENA  
SAN JUAN, PR 00926-5539

JOSE RAMON CARRION MORALES  
PO BOX 9023884  
SAN JUAN, PR 00902-3884

MONSITA LECAROS ARIBAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901-1938

NYDIA I ESPINO  
PO BOX 194542  
SAN JUAN, PR 00919-4542

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

TOYOTA FINANCIAL SERVICES  
19001 S.WESTERN AVE  
TORRANCE, CA 90501

End of Label Matrix	
Mailable recipients	33
Bypassed recipients	0
Total	33